

Michael Faillace & Associates, P.C.

Employment and Litigation Attorneys

60 East 42nd Street, Suite 4510
New York, New York 10165

Telephone: (212) 317-1200
Facsimile: (212) 317-1620

January 6, 2020

BY ECF

Honorable John G. Koeltl
United States District Court
Southern District of New York
500 Pearl Street, Courtroom 14A
New York, NY 10007

*Time to file pre-trial
documents extended to 2/14/20,
The Court will not extend the
deadlines indefinitely.
SD ordered.*

Re: Jaime Vargas Espino et al. v. 525 Grand Street, LLC, et al.
19-cv-335 (JGK)

Your Honor:

*1/7/20 per 6/Koeltl
U.S.D.S.*

This firm represents the Plaintiff in the above-referenced matter. Plaintiff writes jointly with Individual Defendant's counsel to request an adjournment of the time to file pre-trial documents *sine die*. The parties had previously requested a 30 day adjournment of the deadline to file pre-trial documents, which was granted. Counsel request this adjournment as they are trying to resolve this matter in spite of some problematic issues presented. As stated in counsel's letter to the Court dated December 6, 2019, the two Corporate Defendants have never answered nor appeared. The Individual Defendant has appeared and answered, but his counsel stated his client has financial issues that will affect his ability to pay a settlement and to continue paying for representation. Individual Defendant's counsel has also stated his client also has health issues that complicate proceeding forward with trial. As such, both parties agree that at the present time, they require additional time to find a resolution that will not completely deplete resources.

We thank the Court for its time and attention to this matter.

Respectfully submitted,

/s/ Yolanda Rivero
Yolanda Rivero

cc: Mark D. Herman, Esq. (via email and ECF)
Attorneys for Defendant Alphonse Dipilato

USDC SDNY
DOCUMENT
ELECTRONICALLY FILED
DOC#
DATE FILED: 1-7-2020